

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

July 25, 2025

Re: Case No: 1:24-cv-10049 Lively v Wayfarer

**Motion Requesting Leave to Proceed Anonymously in This Court**

Dear Judge Liman,

Non-party YouTube channel @kassidyoc, whose information was sought via third party subpoena, addresses the court to thank His Honor for the consideration allowing the 43<sup>1</sup> of us targets of Ms. Lively's overbroad, invasive, and improperly filed subpoena to be heard by the court anonymously and acknowledge that the court previously offered this after my first failed attempt to file.

Perhaps due to the condition of the subpoena, which looked very much like it had been dropped in a muddy puddle, there had been some delay in notifying us our information was being sought. The subpoena served upon X has the same appearance which seems oddly intentional as with modern office equipment one cannot fathom how one document could be delivered in this condition, let alone two, especially considering that no other documents filed in this case have this appearance. Whatever the cause, there was very little time to respond, which, as the Court can imagine, was very distressing.

I was operating under the belief that I needed to file before the date on the actual subpoena. My requests to Google to verify the filing date were left unanswered and several of my fellow targets had reached out to Ms. Lively's counsel to verify the date but were met with assertions that the office was "trying to figure out" what the subpoenas were all about under instructions given by Ms. Hudson herself. Ms. Hudson knew exactly what was "going on" as the issuing attorney of said subpoenas. With the information I had available to me on that day, I had every reason to believe I did not have the time to make this request to the court and still meet the July 16, 2025 deadline on the subpoena. I appreciate the Court's further instructions for how to proceed in this manner and am informing the court I wish to use this option.

I respectfully move this court for leave to proceed anonymously in the above captioned action, as Jane Doe, and ask the court for instruction on whether or not this necessitates a refiling of my original Motion to Quash with the signature Jane Doe, should the court grant this request, as well as instructions for how to properly sign these documents to distinguish myself. For now, I've included the name of the subpoenaed account but will adjust in future documents according to the instructions of this court.

I again request the Court to quash this unlawful subpoena and put a Protective Order in place pursuant to FRCP 26(c). The subpoena is unlawful and unduly burdensome, as it seeks information that is irrelevant, privileged, or beyond the scope of permissible discovery. Without court intervention, compliance with the subpoena would cause undue hardship and violate established legal protections.

Respectfully submitted,



<sup>1</sup> To date, we know of 16 targets from Google, 7 TikTok, and 20 from X. With Ms. Lively's notice to the court in her request for an extension of the discovery deadline in order to serve more such subpoenas, which took place after both of these subpoenas had already been issued, one can only wonder how many more innocent targets Ms. Lively intends to drag to this Court where they will also have to fight not to have their privacy invaded.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

July 21, 2025

Re: Case No: 1:24-cv-10049 Lively v Wayfarer

**Motion to Seal**

Dear Judge Liman,

Non-party Jane Doe (@kassidyoc) respectfully moves this Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Federal Rule of Civil Procedure 5.2(d), and the Court's inherent authority, to accept this Motion to Seal, permitting the sealing of the following documents filed in connection with this action.

**INTRODUCTION**

Plaintiff seeks to file under seal the following Memorandum in Support of Motion to Seal as well as the following Memorandum in Support of Motion to Proceed Anonymously in This Court, containing an unpublished excerpt from an autobiographical chapter I was asked to write. This book has not been published yet and though it's my story, I do not own this writing since it is now part of an upcoming book, and putting it in print publicly, especially before she has put her book into print, would be a violation of her copyright. Even including her name in this document with an inside peek as to the contents and direction of her upcoming book infringes upon her rights as an author to market and promote the book in the style she has determined where she, as the author, gets to decide what she wants to make known to the public prior to her release. I do not wish for her to become yet another female victim in Ms. Lively's witch hunt because Ms. Lively has wrongfully brought me into this lawsuit.

I submit this chapter in lieu of re-writing my experience because writing it once was traumatic enough even being on my own terms, but I wrote it in the spirit of providing hope and comfort to fellow victims of childhood sexual assault and adult women who've been stalked. It took months for me to write this chapter and I do not feel strong enough to do so again in the rushed amount of time I have to plead before this court, nor in the current state of emotional distress this frivolous and unfounded subpoena has forced upon me. It contains many traumatic events that I have endured in my life but to be concise, I've only included here the one that relates to a large reason for my online anonymity.

The information in this excerpt explains to the court the unnecessary risk to my safety unmasking me would bring as the man who took these actions against me has not been identified and would surely recognize the description of events as they are told. I left the area for years after these events to work abroad but am back living in the same state as where these incidents occurred. The book, when eventually published, is for a smaller, niche audience in the south, whereas this trial is gathering more interested observers by the day where any and every detail is distributed throughout, not just the nation, but the world.

Speaking to another important and serious issue, I have multiple screenshots of certain accounts on Reddit who have actively been seeking my identity and location even before the subpoena was issued. Only moments after my Motion hit the docket, an entire post dedicated to my identity and ethnicity was put up with wild assumptions and misrepresentations about the name on the signature. Hateful conspiracy theorists, racists, and a person (who cosplays being an attorney with cases in federal court) on Reddit all day relished the chance to speak about who they think I am. This person actively seeks out anyone they think is an attorney searching for

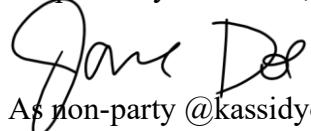
them nationwide to discover who they are, tracks people to other forms of social media and then posts about them back on Reddit disclosing their names and information they've found about their real lives. I have screenshots that have been sent to me for months now of accounts thought to be paid by Ms. Lively and non-party Mr. Reynolds (whose name curiously has reappeared on our subpoenas after being dismissed by this court) and their comments about me specifically. Revealing my identity to people like this is a horrifying thought indeed. In fact, because of this subpoena and the attention it has brought, I am seriously considering withdrawing my submission to this author. It's sad that the people who claim to support Ms. Lively because of a noble cause of "believing women" have been the cruelest in their treatment of real women victims. Ms. Lively, after proclaiming herself to be the "voice of women," has actually not used her voice once in support of any woman, supported any women's agency, shelter, or organization. Instead, she's been a tremendous force in attempting to silence women for her own benefit. Every woman I've interacted within this community has been a victim in some horrible way. I intended my story to help other victims of horrifying crimes to see that we can overcome the traumas we've experienced. We can rebuild our strength and use our lives in a way to help others. The intense fear of violation and exposure Ms. Lively has put upon me with this invasive and unwarranted subpoena has reopened the traumas that I have endured since childhood. I've had to resume therapy after many years of being able to use tools from previous therapies to exist in my daily life. I can assure this court that I am not alone in feeling this way, but every one of us who has been violated by this intrusive subpoena are experiencing these feelings.

I drafted this letter before I left for a trip abroad and in the time since then, yet another non-party woman's address was leaked to the entire world by Ms. Lively's counsel.<sup>1</sup> Are these prestigious attorneys really this careless or is this weaponized incompetence aimed at yet another means to intimidate us into silence since these subpoenas were not able to accomplish this? How long will the Court allow this sort of behavior to go on unchecked? The Court has long been notified of the death threats, threats of kidnapping, and actual arson that has taken place as a direct result of addresses and phone numbers being released to the public docket on a case with such heightened interest and attention. Surely the Court can see the very real danger that Ms. Lively's attorneys have created for us, yet offer us and the Court, no proof of a reason we have been targeted.

Also, since I began drafting this letter, filings added to the docket have shown Ms. Lively's counsel has been so bold as to lie to His Honor about a list we were supposedly on as a reason for our being subpoenaed. The Wayfarer response has made it clear there is no such list that matches this long list of people who have been unnecessarily burdened by this second sham subpoena we've encountered in this case.

I beseech the court to accept this Motion to Seal to protect my safety, as well as the author's name and copyright, any and all references to her book, and my contributions to it in any mention in any filing going forward.

Respectfully submitted,

  
As non-party @kassidyoc

<sup>1</sup>I find this repeated action to be so surprising since this is being done by attorneys who practice in California who should be well aware that this goes beyond bad lawyering and straight into criminal behavior as it is illegal to dox according to California Penal Code 653.2. Though the case is being fought in New York, these documents are most likely being prepared in California, the place of residence of these attorneys and their firm, making these events criminally actionable.